

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Diane M. Doolittle (CA Bar No. 142046)  
dianedoolittle@quinnemanuel.com  
3 555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
4 Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)  
andrewschapiro@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Telephone: (312) 705-7400  
Facsimile: (312) 705-7401

6 Stephen A. Broome (CA Bar No. 314605)  
stephenbroome@quinnemanuel.com  
7 Viola Trebicka (CA Bar No. 269526)  
violatrebicka@quinnemanuel.com  
8 865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
9 Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)  
josefansorge@quinnemanuel.com  
Carl Spilly (admitted *pro hac vice*)  
carlspilly@quinnemanuel.com  
1300 I. Street, N.W., Suite 900  
Washington, D.C. 20005  
Telephone: 202-538-8000  
Facsimile: 202-538-8100

11 Jonathan Tse (CA Bar No. 305468)  
jonathantse@quinnemanuel.com  
12 50 California Street, 22nd Floor  
San Francisco, CA 94111  
13 Telephone: (415) 875-6600  
14 Facsimile: (415) 875-6700

Jomaire A. Crawford (admitted *pro hac vice*)  
jomairecrawford@quinnemanuel.com  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

15 *Attorneys for Defendant Google LLC*

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18  
19 CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
20 CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
21 situated,

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION TO SEAL  
JOINT CASE MANAGEMENT  
STATEMENT**

22 Plaintiffs,

23 v.

24 GOOGLE LLC,  
25 Defendant.

26

27

28

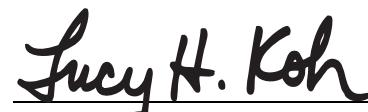
~~[PROPOSED]~~ ORDER

Before the Court is Defendant Google LLC's Administrative Motion to Seal portions of the parties' Joint Case Management Statement ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

<b>Document Sought to Be Sealed</b>	<b>Party Claiming Confidentiality</b>	<b>Court's Ruling on Motions to Seal</b>	<b>Basis for Sealing Portion of Document</b>
Joint Case Management Statement	Google	GRANTED as to redacted portions at:  page 11, lines 6-14; page 12, lines 9, 11, 13-14, 17-20; page 14, lines 12-13.	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to cookies, internal identifiers, and financial projections as well as Google's internal communications and practices with regard to Incognito, X-Client-Data Header and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

**SO ORDERED.**

DATED: September 23, 2021



HON. LUCY H. KOH  
United States District Judge